NEW MEXICO
ENVIRONMENT DEPARTMENT

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. Governor

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.env.nm.gov

RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

December 31, 2015

Mr. Nick Thompson, Administrator
Paa-Ko Communities Sewer Association
1717 Louisiana Blvd. Suite 111
Albuquerque, New Mexico 87110

Re: Minor Industrial, SIC 4952, NPDES Compliance Evaluation Inspection, Paa-Ko Wastewater Treatment Plant, NM0030724, December 17, 2015

Dear Mr. Thompson:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Gladys Gooden-Jackson
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
1445 Ross Avenue Point
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Daniel Valenta at (505) 827-2575 or at daniel.valenta@state.nm.us.

Sincerely,

/s/Bruce Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters, USEPA (6EN-WM) by e-mail
Brent Larsen, USEPA (6WQ) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
NMED District I, William Chavez by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	yr/mo/day	17	Inspec. Type	18	Inspector	19	Fac Type	20
	N	5	NM0003072		151217		C		S		2	

Remarks: MINOR INDUSTRIAL

Inspection Work Days	67–69	Facility Evaluation Rating	70	BI	71	QA	72	73–74	75–80
			4	N		N			Reserved

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
Paa-Ko Community Sewer Association, located off HWY 14 near Sandia Park. Turn on to Paa-Ko drive, junction of Kiva Pl and Paa-Ko, entrance of WWTP. **Bernalillo County**	**1040 / 12-17-2015**	**05-01-2007**
	Exit Time/Date **1440 / 12-17-2015**	Permit Expiration Date **04-30-2012**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Mr. Mike Butler/Field Supervisior/505-281-3294 Fax 505-281-0219 **Ms. Cynthia Arnold/EPCOR Water/505-281-3294 ex 2104 cell 505-401-8499**	**Lat N 35 11 43.43** **Long W -106 18 57.59**
Name, Address of Responsible Official/Title/Phone and Fax Number **Mr. Nick Thompson, Administrator** **Paa-Ko Communities Sewer Association** **1717 Louisiana Blvd. Suite 111** **Albuquerque, New Mexico 87110**	Contacted Yes [ ] No [*] **SIC 4952**

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

SEE ATTACHED CHECKLIST FOR FURTHER EXPLANATIONS.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA ***/s/Daniel Valenta***	**NMED/SWQB 505-827-2575**	**12/30/2015**
Signature of Management QA Reviewer **SARAH HOLCOMB** ***/s/Sarah Holcomb***	**NMED/SWQB 505-827-2798**	**Date** **12/30/2015**

Paa-Ko Communities Sewer Association	PERMIT NO. NM0030724

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☐S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED Yes)*

DETAILS: **Minor change in treatment process without notifying EPA/State.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE ☒ Y ☐ N ☐ NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES ☒ Y ☐ N ☐ NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT ☒ Y ☐ N ☐ NA

4. ALL DISCHARGES ARE PERMITTED ☒ Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED no)*

DETAILS: **No discharge. No sampling or analysis performed.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs ☐ Y ☐ N ☒ NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. **No sampling or analysis performed** ☐ S ☐ M ☐ U ☒ NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING ☐ Y ☐ N ☒ NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING ☐ Y ☐ N ☒ NA

c) ANALYTICAL METHODS AND TECHNIQUES. ☐ Y ☐ N ☒ NA

d) RESULTS OF ANALYSES AND CALIBRATIONS. ☐ Y ☐ N ☒ NA

e) DATES AND TIMES OF ANALYSES. ☐ Y ☐ N ☒ NA

f) NAME OF PERSON(S) PERFORMING ANALYSES. ☐ Y ☐ N ☒ NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. **No laboratory equipment on site.** ☐ S ☐ M U ☒ NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. ☒ S ☐ M ☐ U ☐ NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. **No sampling or analysis performed** ☐ Y ☐ N ☒ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☒ S ☐ M ☐U ☐ NA *(FURTHER EXPLANATION ATTACHED **no**)*

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED. ☒ S ☐ M ☐ U ☐ NA

2. TREATMENT UNITS PROPERLY MAINTAINED. ☒ S ☐ M ☐U ☐ NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED . **Emergency generator not onsite. To be brought in if needed.** ☒ S ☐ M ☐ U ☐ NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. ☒ S ☐ M ☐ U ☐ NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE ☒ S ☐ M ☐ U ☐ NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. ☒ S ☐ M ☐U ☐ NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. ☒ S ☐ M ☐ U ☐ NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. ☒ Y ☐ N ☐ NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **No SOP's in place in case of a discharge.** ☐ Y ☒ N ☐ NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. ☐Y ☒ N ☐ NA

Paa-Ko Communities Sewer Association	PERMIT NO. NM 0030724

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐ Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED no).*
DETAILS: **No discharge. No sampling or analysis performed.**

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☐ Y ☐ N ☒ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☐ Y ☐ N ☒ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☐ Y ☐ N ☒ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☐ Y ☐ N ☒ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☐ Y ☐ N ☒ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☐ Y ☐ N ☒ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☐ Y ☐ N ☒ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED no)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☒ Y ☐ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE.	☐ Y ☐ N ☒ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☐ Y ☐ N ☒ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☐ Y ☐ N ☒ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☐ Y ☐ N ☒ NA
6. HEAD MEASURED AT PROPER LOCATION.	☐ Y ☐ N ☒ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED no)*
DETAILS:
No samples taken, no laboratory.

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☐ Y ☐ N ☒ NA

Paa-Ko Communities Sewer Association	Permit No. NM 0030724

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☐ M ☐ U ☒ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☐ M ☐ U ☒ NA

5. DUPLICATE SAMPLES ARE ANALYZED. __ % OF THE TIME. ☐ Y ☐ N ☒ NA

6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. **When samples are needed Hall Laboratory would be contacted.** ☐ Y ☐ N ☒ NA

LAB NAME **Hall Environmental Analysis Laboratory, Inc.**

LAB ADDRESS **4901 Hawkins NE, Albuquerque, NM 87109**

PARAMETERS PERFORMED **BOD, TSS, E coil, WET Test**

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED see photo 3).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	n/a	n/a	n/a	n/a	n/a	n/a	

RECEIVING WATER OBSERVATIONS: N/A

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS: **When needed septic hauler picks up sludge, taken to Albuquerque.**

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☒ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED ___).*

1. SAMPLES OBTAINED THIS INSPECTION. **No samples obtained during inspection.** ☐ Y ☒ N ☐ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Compliance Evaluation Inspection
Paa-Ko Communities Sewer Association
NPDES Permit No. NM0030724

Introduction

A Compliance Evaluation Inspection (CEI) was conducted at the Paa-Ko Communities Wastewater Treatment Facility on December 17, 2015, by Daniel Valenta and Doug Eib, of the State of New Mexico Environmental Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a private domestic wastewater treatment facility classified as a minor industrial discharger under the federal Clean Water Act (CWA), Section 402 National Pollution Discharge Elimination System (NPDES) permit program, and is assigned NPDES permit number NM0030724. The facility design flow is 0.10 million gallons per day (MGD).

The Paa-Ko Communities Wastewater Treatment Plant (WWTP) discharges into a holding pond or pumped directly into the golf course pond. When water is needed at the golf course can be pumped from the holding pond to the golf course pond. The gulf course pond is also supplied with ground water. There is an overflow pipe in the pond (see photo 1-4) which allows discharges to an unnamed ephemeral arroyo thence to San Pedro Creek of the Rio Grande Basin. The permit regulates the WWTP discharges to the Ephemeral Segment 20.6.4.97 according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC.* The designed uses of this unclassified segment are livestock watering, wildlife habitat, limited aquatic life, and secondary contact.

The inspector arrived at the Paa-Ko Communities WWTP at 1302 hours and conducted an entrance interview with Mr. Mike Butler, Field Supervisor, Operator, Level III. The inspector made introductions, presented his credentials, and discussed the purpose of the inspection with Mr. Butler. An exit interview to discuss preliminary finding of the inspection was conducted at 1515 hours with Mr. Butler at the WWTP office.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the permittee and/or NMED.

Treatment Scheme

This facility was previously a subsurface flow constructed wetland with infiltration beds. It was retrofitted with a membrane bioreactor (MBR) microfiltration system and became functional in December 2007. The collection system drains the residential septic systems. After final grit removal and filter at the WWTP the influent then flows into an anoxic basin where denitrification takes place (see photo 1). From the anoxic basin, influent then enters a MBR microfiltration basin. Through the use of a permeate pump, a vacuum is applied to a header connected to the membranes. The vacuum draws the treated water through the hollow fiber ultrafiltration membranes (see photo 2). Permeate is then directed to UV disinfection (see photo 3).

Intermittent airflow is introduced to the bottom of the membrane module, producing turbulence that scours the external surface of the hollow fibers. This scouring action transfers rejected solids away from the membrane surface. The system is controlled by a programmable logic controller, which if necessary, can be manually operated. If a system malfunction or power outage problem occurs the system will call the operators. There is a back up call system in place if the primary system fails. The outside UV disinfection system is not connected to the programmable logic controller system and no emergency call out system is presently in place. Effluent flows to a lined pond for storage or pumped directly to the Paa-Ko Ridge golf course pond.

Sludge Management

The mixed liquor concentration (MLSS) for this type of system can run from 8,000 to 35,000 mg/L. The wasting is infrequent and when needed a septic hauler is contracted.

Compliance Evaluation Inspection
Paa-Ko Communities Sewer Association
NPDES Permit No. NM0030724

Further Explanations

Section A – Permit Verification: "Marginal"

Per Part III.D.1.b:

b. MUNICIPAL PERMITS

> *Any change in the facility discharge (including the introduction of any new source or significant discharge or significant changes in the quantity or quality of existing discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes in influent quality permitted that will cause violation of the effluent limitations specified herein.*

Finding:

Changes have been made to the facilities final treatment process, the UV disinfection Unit. The treatment unit in the past was outdoors exposed to rain, heat, and cold. Moving the unit indoors in a controlled environment will increase the efficiency and lifespan of a new unit. This change may trigger the above requirement.

Section E – Flow Measurement: "Satisfactory"

The permit requires in PART I. C.

> *"The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary).*
>
> *Overflows that endanger health or the environment shall be orally reported at (214) 665-6595, and NMED Surface Water Quality Bureau at (505) 827-0187, within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows that endanger health or the environment shall be provided to EPA and the NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance."*

Findings:

The Paa-Ko Communities Sewer Association ("PCSA") is responsible for the WWTP with an active NPDES permit NM0030724 in their name. The Paa-Ko Golf Venture LLC, a New Mexico limited liability company ("PGV") controls the pumping to the ponds. The PGV does not have a NPDES permit allowing them to discharge to waters of the US ("WOTUS").

Compliance Evaluation Inspection
Paa-Ko Communities Sewer Association
NPDES Permit No. NM0030724

Water from the 6 million gallon lined retention pond is pumped up to Paa-Ko golf course pond (see photo 4). A spill occurs when the golf course pond overflows. This may occur if the pumps are left on too long (see photo 5). Any discharge from the golf course pond would not accurately reflect the discharge from the wastewater treatment plant as it is greatly diluted with groundwater that the pond is supplemented with or any chemicals that may be introduced to the water from the pond itself (i.e. pesticides, herbicides, etc.).

The permittee's representative indicated that the wastewater treatment plant provides about 40,000 gallons of water per day for irrigation purposes, but the golf course needs more water even in the winter time. Ground water is purchased to supplement the deficit water needs of the golf course. A flow meter is located on the overflow pipe leaving the golf course pond. It discharges to an unnamed ephemeral arroyo, and then to San Pedro Creek.

At the WWTP, treated effluent travels through the UV system, the final treatment, and is discharged to a 6 million gallon lined retention pond. There is no overflow or outfall built into the retention pond. Where would a discharge occur at the retention pond if water is not removed? Should this be the true discharge location, Outfall 001?

The staff at the WWTP feels once the treated effluent is pumped out of the retention pond they have no control over it and thus should not be held responsible for its use or discharge into a WOTUS. At the present time in an effort to clarify the above questions a Memorandum of Understanding ("MOU") may be prepared between the PCSA and the PGV. The PCSA may wish to address these questions with the EPA after a MOU is completed.

The facility was inspected before on January 10, 2013. At that time the meter on the golf course overflow pipe was recorded at (81157.200). This meter was checked again during this inspection. The meter read (81157.200) no change had occurred, (see photo 6). There was no visible indication in the sediment at the overflow pipe that a spill had occurred.

NMED/SWQB
Official Photograph Log

Photo # 1

Photographer: Daniel Valenta	Date: December 17, 2015	Time: 1147 hours
City/County: Sandia Park / Bernalillo County		
Location: Paa-Ko Wastewater Treatment Plant		
Subject: Anoxic basin where denitrification takes place.		

NMED/SWQB
Official Photograph Log

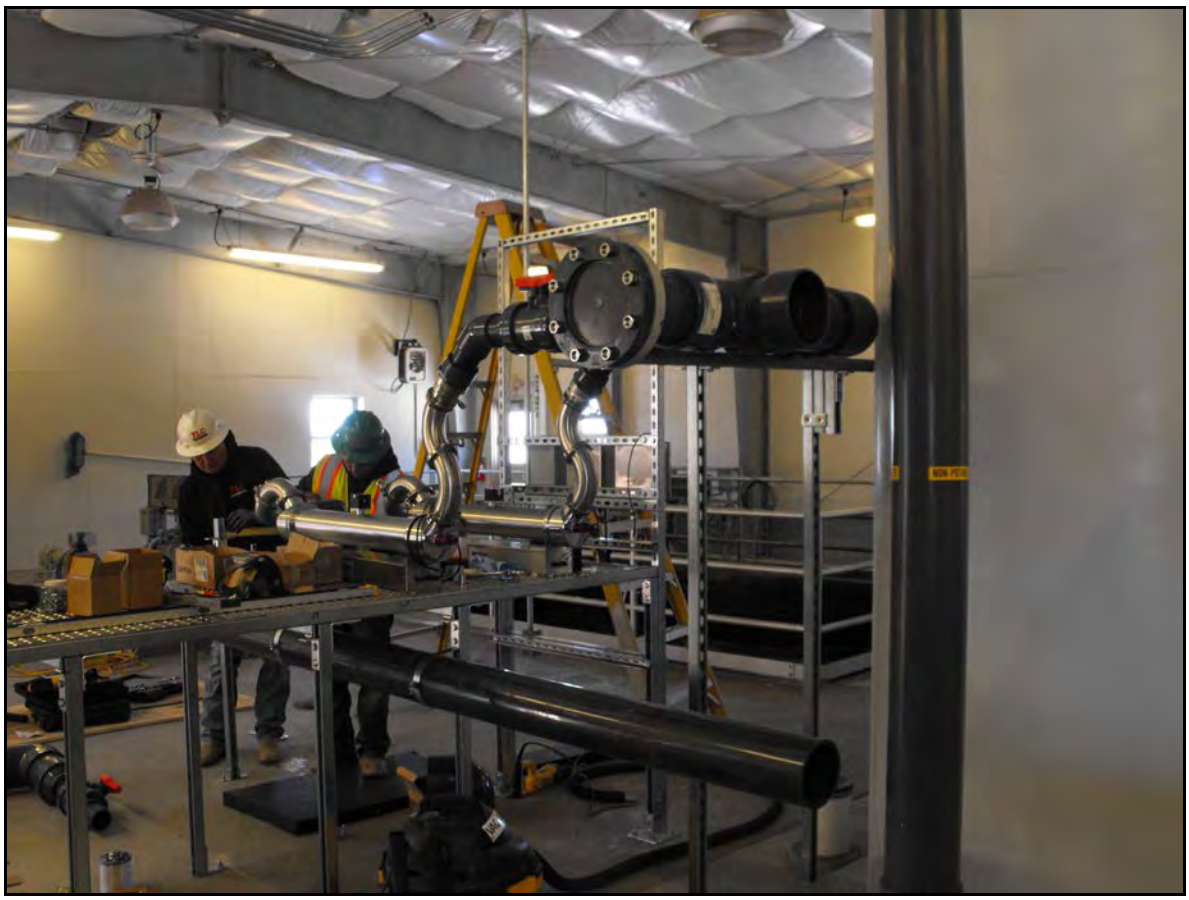
Photo # 2

Photographer: Daniel Valenta	Date: December 17, 2015	Time: 1148 hours
City/County: Sandia Park / Bernalillo County		
Location: Paa-Ko Wastewater Treatment Plant		
Subject: MBR microfiltration basin.		

NMED/SWQB
Official Photograph Log

Photo # 3

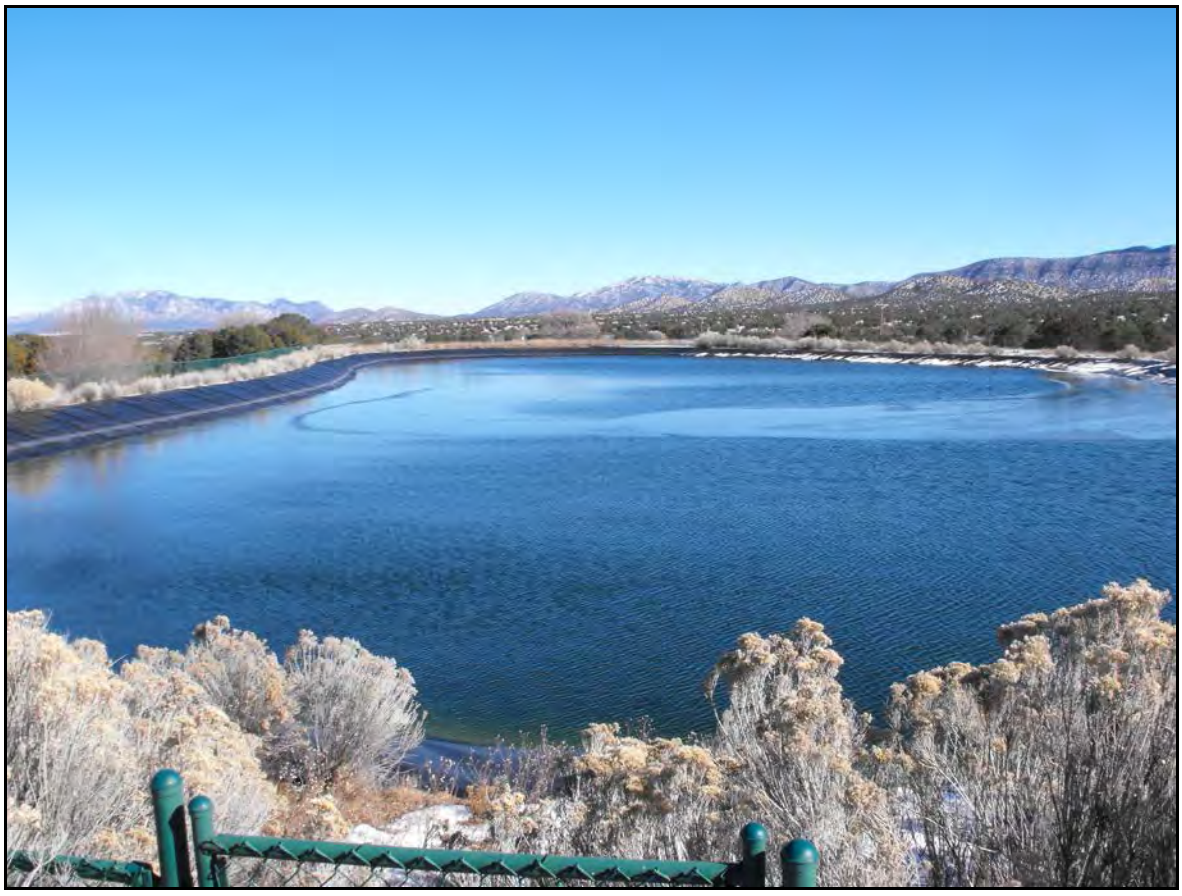
Photographer: Daniel Valenta	Date: December 17, 2015	Time: 1151 hours
City/County: Sandia Park / Bernalillo County		
Location: Paa-Ko Wastewater Treatment Plant		
Subject: A new UV treatment system is being constructed. This moves the UV treatment system from outside the building to under cover from the elements.		



NMED/SWQB
Official Photograph Log

Photo # 4

Photographer: Daniel Valenta	Date: December 17, 2015	Time: 1211 hours
City/County: Sandia Park / Bernalillo County		
Location: Paa-Ko Wastewater Treatment Plant		
Subject: 6 million gallon lined retention pond.		



NMED/SWQB
Official Photograph Log

Photo # 5

Photographer: Daniel Valenta	Date: December 17, 2015	Time: 1222 hours
City/County: Sandia Park / Bernalillo County		
Location: Paa-Ko Wastewater Treatment Plant		
Subject: Paa-Ko golf course irrigation pond.		

NMED/SWQB
Official Photograph Log

Photo # 6

Photographer: Daniel Valenta	Date: December 17, 2015	Time: 1222 hours
City/County: Sandia Park / Bernalillo County		
Location: Paa-Ko Wastewater Treatment Plant		
Subject: Flow meter to record event if the golf course pond were overfilled and a spill occur.